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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,) No. CR 12-00132-EJD
15 vs.)
16 GONZALO COVARRUBIAS-FLORES,)
17 Defendants.)
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STIPULATION

Defendant Gonzalo Covarrubias-Flores, by and through Assistant Federal Public Defender Varell L. Fuller, and the United States, by and through Special Assistant United States Attorney Carolyn Sanin, hereby stipulate that, with the Court's approval, the status hearing currently set for Monday, August 6, 2012, at 1:30 p.m., shall be continued to Monday, September 17, 2012 at 1:30 p.m.

The reason for the continuance is defense counsel requires additional time to conduct further investigation and complete ongoing legal research necessary to adequately advise Mr. Covarrubias-Flores.

For the foregoing reasons, the parties jointly request and agree to an exclusion of the time between August 6, 2012, and September 17, 2012, under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for effective preparation by defense counsel.

4 IT IS SO STIPULATED.

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6 || Dated: August 1, 2012

/s/
VARELL L. FULLER
Assistant Federal Public Defender

9 || Dated: August 1, 2012

/s/
ANN MARIE URSPINI for
CAROLYNNE A. SANIN
Special Assistant United States Attorney

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[PROPOSED] ORDER

GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY
ORDERED that the hearing currently set for Monday, August 6, 2012, shall be continued to
Monday, September 17, 2012, at 1:30 p.m.

19 THE COURT FINDS that failing to exclude the time between August 6, 2012, and
20 September 17, 2012, would unreasonably deny defense counsel reasonable time necessary for
21 effective preparation, taking into account the exercise of due diligence. See 18 U.S.C. §
22 3161(h)(7)(B)(iv).

THE COURT FURTHER FINDS that the ends of justice served by excluding the time between August 6, 2012, and September 17, 2012, from computation under the Speedy Trial Act outweigh the interests of the public and the defendant in a speedy trial.

26 THEREFORE, IT IS HEREBY ORDERED that the time between August 6, 2012, and

1 September 17, 2012, shall be excluded from computation under the Speedy Trial Act, 18 U.S.C.
2 § 3161(h)(7)(A) and (B)(iv).

3 IT IS SO ORDERED.

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5 Dated: August 2, 2012

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THE HONORABLE EDWARD J. DAVILA
United States District Court Judge
